

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

March 31, 2023

BY ECF

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
New York, NY 10007

**Re: United States v. Juan LaSanta
22 Cr. 583 (PAC)**

Dear Judge Crotty:

I write on behalf of my client Juan LaSanta to respectfully request that the Court permit Mr. LaSanta to attend his eldest daughter's father-daughter dance at her school on April 2, 2023 at 32 South 5th Avenue, Mount Vernon, NY 10550, with the specific times to be set at the discretion of Pretrial Services. Additionally, the defense requests that Mr. LaSanta be permitted to travel to New Jersey and attend his youngest daughter's birthday party on April 10, 2023 at the American Dream Mall located at 1 American Dream Way, East Rutherford, NJ 07073, with the specific times of attendance to be set at the discretion of Pretrial Services.

On September 27, 2022, the magistrate judge imposed the following bail conditions: A \$75,000 personal recognizance bond to be cosigned by two financially responsible persons; travel restricted to the Southern and Eastern Districts of New York; home incarceration with GPS monitoring; drug and mental health treatment; no pre-trial supervision as directed by pretrial services; no possession of firearms; maintain a residence as approved by Pretrial Services; Tennisha Morris to serve as a third-party custodian; and surrender of travel documents with no new applications.

On November 21, 2022, with the consent of the prosecution and pretrial services, this Court granted the defense's application for a modification of bail conditions from home incarceration to home detention and removed the third-party custodian requirement from the bond.

Since September, Mr. LaSanta has abided by the strict terms of his bail conditions. During this time, Mr. LaSanta has obtained full-time employment through the CEO program as a maintenance worker at New York City Housing Authority (NYCHA). Additionally, Mr. LaSanta goes to Samaritan Village for weekly sessions for therapy that Mr. LaSanta has found helpful in addressing his anxiety, depression, and post-traumatic stress disorder. He also cares for his two young daughters every weekend and maintains a close relationship with them both.

Given Mr. LaSanta's continued compliance, he is requesting permission to attend these two events for his daughters – one of which is located in the District of New Jersey. Pretrial Services Officer Lettieri informed the defense that while it is Office policy for pretrial services to object to any request for social visits, there are no objections beyond that policy that the Office has specifically to Mr. LaSanta. The government defers to Pretrial Services.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ *Marisa K. Cabrera*

Marisa K. Cabrera

Assistant Federal Defender

Tel.: (212) 417-8730

SO ORDERED:

Paul M. Crotty 3-31-23

HONORABLE Paul A. Crotty
United States District Judge

cc: Adam Sowlati, Esq., Assistant United States Attorney
Kiersten Fletcher, Esq., Assistant United States Attorney